



June 29, 2012

Mr. Sean Sheldrake
U.S. Environmental Protection Agency
1200 Sixth Avenue
Suite 900, M/S ECL-110
Seattle, Washington 98101

Subject: EE/CA Schedule, Arkema Inc. Portland Facility
Administrative Order on Consent (AOC) for Removal Action
U.S. EPA Region 10 Docket No. CERCLA 10-2005-0191

Dear Mr. Sheldrake:

In accordance with EPA's letter dated May 2, 2012, the draft engineering evaluation/cost analysis (EE/CA) for the Arkema Early Action Area is due to EPA on July 26, 2012. Legacy Site Services LLC (LSS), agent for Arkema Inc., hereby requests an additional 30-day extension to the schedule for delivery of the EE/CA.

LSS' consultant, Integral Consulting, has requested additional time to complete its analyses and finalize the draft EE/CA report. Important technical tasks which require additional time to complete include:

- Screening of other COIs against PRGs and/or RALs that was deferred from the Final Removal Action Area Characterization (RAAC) report.
- Development of remedial technology assignments for the Arkema site which integrate key analyses and findings from the draft Portland Harbor Feasibility Study (FS).
- Conceptual-level integration of Arkema objectives and remedial alternatives with preliminary Portland Harbor alternatives and goals.

This is a critical step in the EE/CA process and we want to ensure we provide the appropriate groundwork for selection of a removal action; in consideration of the recently released draft of the Portland Harbor FS.

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Please contact me at (610) 594-4430 if you have any questions or comments pertaining to this letter. LSS looks forward to submitting the draft EE/CA report and working with EPA through the EE/CA process.

Sincerely,

Legacy Site Services LLC

A handwritten signature in black ink, appearing to read 'J. Todd Slater', is enclosed within a rectangular box.

J. Todd Slater
Assistant Vice President

cc: (electronic)

James M. Anderson, Oregon DEQ
Rick Kepler, Oregon Department of Fish and Wildlife
Rob Neely, NOAA Coastal Resources Coordination
Dr. Nancy Munn, NOAA Fisheries
Jeremy Buck, US Fish and Wildlife
Preston Sleeper, US Department of Interior
Brian Cunningham, Confederated Tribes of the Warm Springs Reservation of Oregon
Rose Longoria, Confederated Tribes and Bands of the Yakama Nation
Pete Wakeland, Confederated Tribes of the Grand Ronde Community of Oregon
Tom Downey, Confederated Tribe of the Siletz Indians
Audie Huber, Confederated Tribes of the Umatilla Indian Reservation
Erin Madden, Nez Perce Tribe
Jennifer Peterson, DEQ
Matt McClincy, DEQ
Mike Poulsen, DEQ
Alex Cyril, DEQ
Cy Young, DSL
Lori Cora, EPA
Chip Humphrey, EPA
Lance Peterson, CDM
Genevieve Angle, NOAA Fisheries
Sheila Fleming, Ridolfi
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David Livermore, Integral
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